IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff, Case No. 2:24-cv-2101

v.

STATE OF TENNESSEE, and TENNESSEE BUREAU OF INVESTIGATION,

Defendants

CHIEF JUDGE LIPMAN

CHIEF MAGISTRATE JUDGE PHAM

UNITED STATES' MOTION TO COMPEL THE STATE OF TENNESSEE TO PRODUCE DOCUMENTS

Plaintiff United States of America respectfully moves pursuant to Federal Rule of Civil Procedure 37 and Local Rule 7.2(a)(1) to compel Defendant State of Tennessee to produce documents in response to Plaintiff's First Set of Requests for Production of Documents, served on July 22, 2024. *See* ECF No. 67. Pursuant to Local Rule 7.2, counsel for the United States certifies that the parties have conferred regarding the substance of this motion by phone and e-mail between August 27 and 30, 2024, but the parties have not been able to reach agreement. The State opposes this motion.

Dated: September 13, 2024

REBECCA B. BOND Chief

/s/ Ali N. Szemanski KEVIN KIJEWSKI Deputy Chief STEPHANIE M. BERGER NY Bar #5201439 ALI N. SZEMANSKI PA Bar #327769 ANNA G. BOBROW DC Bar #1743249 Trial Attorneys **Disability Rights Section** Civil Rights Division U.S. Department of Justice 150 M Street NE Washington, D.C. 20002 202-307-0663 Stephanie.Berger@usdoj.gov Ali.Szemanski@usdoj.gov Anna.Bobrow@usdoj.gov

Counsel for United States

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the

Court's electronic filing system on this the 13th day of September 2024, upon:

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